Pitti Engineering Limited

(Formerly Pitti Laminations Limited)
ISO 9001:2015 ISO 14001:2015
www.pitti.in



30th June 2021

To, BSE Ltd Floor 25, P J Towers, Dalal Street Mumbai – 400 001

Scrip Code: 513519

To, National Stock Exchange of India Limited Exchange Plaza, Bandra Kurla Complex Bandra (E), Mumbai – 400 051

Scrip Code: PITTIENG

Dear Sir,

Sub: Annual Secretarial Compliance Report for the year ended 31st March 2021 Ref: SEBI Circular No.CIR/CFD/CMD1/27/2019 dated 8th February 2019

Pursuant to SEBI Circular No.CIR/CFD/CMD1/27/2019 dated 8th February 2019 please find enclosed herewith Annual Secretarial Compliance certificate for the year ended 31st March 2021 issued by Shri Ajay Kishen, Practicing Company Secretary.

You are requested to take the same on record.

Thanking you,

Yours faithfully,

For Pitti Engineering Einited

Mary Monica Braganza

Company Secretary & Compliance Officer

FCS: 5532

CIN: L29253TG1983PLC004141

Cs. AJAY KISHEN

LLB, FCS COMPANY SECRETARY

4-1-1239/3 & 4, 2nd Floor, Kishens Residency, King Koti, Hyderabad — 500 001. Cell: 9246345274, Email id: <u>ajaykishen2021@gmail.com</u>

> Secretarial Compliance report of Pitti Engineering Limited [Formerly Pitti Laminations Limited] For the year ended 31st March 2021

I Ajay Kishen, Company Secretary in whole time practice have examined:

- a) all the documents and records made available to me and explanations provided by Pitti Engineering Limited ("the listed entity")
- b) the filings/ submissions made by the listed entity to the stock exchanges;
- c) website of the listed entity;
- d) other relevant documents / filings as may be relevant, which has been relied upon to make this certificate;

for the year ended 31st March 2021 ("Review period") in respect of compliance with the provisions of:

- a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars / guidelines issued thereunder, have been examined, include:-

- a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements)
 Regulations, 2018 Not Applicable as there was no reportable event during the review period
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d) Securities and Exchange Board of India (Buyback of Securities) Regulations 2018 - Not Applicable as there was no reportable event during the review period;
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 Not Applicable as there was no reportable event during the review period;



- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 – Not Applicable as there was no reportable event during the review period;
- g) Securities and Exchange Board of India (Issue and Listing of Non-convertible Redeemable Preference Shares) Regulations, 2013 Not Applicable as there was no reportable event during the review period;
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018

and circulars / guidelines issued thereunder

and based on the above examination, I hereby report that, during the review period:

a) The listed entity has complied with the provisions of the above Regulations and circulars / guidelines issue thereunder, except in respect of matters specified below:

Sr. No	Compliance Requirement	Deviations	Observations/
	(Regulations/ circulars/		Remarks of the
	guidelines including specific	27	Practicing Company
	clause)		Secretary
	-Ni		

- b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars / guidelines issued thereunder in so far as it appears from my examination of those records.
- c) There were no actions taken against the listed entity / its promoters directors / material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts / Regulations and circulars / guidelines issued thereunder in so far as it appears from my examination of these records.

Sr	Action taken by	Details of	Details of action	Observations/
No.		violation	taken E.g. fines,	remarks of the
			warning letter,	Practicing
			debarment, etc.	Company
			.0	Secretary, if any
		Not Appli	cable	



d) The listed entity has taken the following actions to comply with the observations made in previous reports – Not Applicable as no observations were made in previous reports.

Sr	Observations of the	Observations made in	Actions	Comments of the			
No.	Practicing Company	the secretarial	taken by the	Practicing Company			
	Secretary in the previous report	compliance report for the year ended(The	listed entity, if	Secretary on the actions taken by the			
		years are to be	any	listed entity			
		mentioned)		:			
Not Applicable							
Not ripplicable							

e) Since the auditor has already been appointed, the terms of appointment of the auditor have been suitably modified to give effect to 6(A) and 6(B) of SEBI Circular CIR/CFD/CMD/114/2019 dated 18th October 2019.

PRACTICING COMPANY SECRETARY

Ajay Kishen

Practicing Company Secretary

M.No: 6298 CP:5146 UDIN: F006298C000485953

Place: Hyderabad Date: 18/06/2021